

**REMARKS**

Claims 2-5, 7-13, 15-18, and 20-26 are pending in the present application.

Reconsideration of the claims is respectfully requested.

**I. 35 U.S.C. § 102, Anticipation**

The examiner has rejected claims 3-5, 7-13, 16-18 and 20-26 under 35 U.S.C. § 102(e) as being anticipated by Piazza et al. (US Pat 6,026,438). This rejection is respectfully traversed.

Regarding **claim 5**, Piazza et al. disclose the snapshot may be configured to include or exclude portions of data within the data processing (col. 3, lines 21-33, col. 4, lines 23-27, 42-51).

Regarding **claim 7**, Piazza et al. disclose a method for identifying and storing changes to a data processing system within a distributed data processing system, the method comprising the computer-implemented steps of:

- initializing the data processing system for a capture of an initial state of the data processing system (col. 3, lines 44-50, col. 6, lines 63-67);
- modifying (col. 4, lines 23-27);
- capturing the modified state (col. 6, lines 63-67, col. 7, lines 15-62, col. 8, lines 30-33);
- storing differences between initial state and the modified state (col. 7, lines 15-39), wherein the differences are separated into system-specific changes (col. 8, lines 30-32), and user-specific changes (col. 11, lines 50-60);

wherein the system specific changes are applied on a per-system basis and the user-specific changes are applied on a per-user basis (col. 7, lines 15-62, col. 11, lines 5-65);

wherein the differences between the initial state and the modified state comprise differences between user files, system files, user registries, and system registries (col. 6, lines 63-67, col. 7, lines 13-62, col. 8, lines 27-32, col. 11, lines 6-65, col. 10, lines 2-55); and

wherein the differences between user files and differences between user registries may be used to manage configurability of the application on a per-user basis (col. 11, line 5 – col. 12, line 36, "This will document personal templates, address book, contact list, and other personal data. Specifically, under Profile in the home directory, file USER.USER (in NT 4.0, this file is called NTUSER.DAT) stores all USER specific registry entries which is defines as HKEY.sub.-- CURRENT.sub.-- USER whenever a user logs onto a workstation.").

Claim 7 is reproduced for reference:

7. (Previously Amended) A method for identifying and storing changes to a data processing system within a distributed data processing system, the method comprising the computer-implemented steps of:

- initializing the data processing system for a capture of an initial state of the data processing system;

- modifying the data processing system;

- capturing a modified state of the data processing system; and

- storing differences between the initial state and the modified state as a set of configuration parameters in a depository, wherein the differences are separated into system-specific changes and user-specific changes;

- wherein the system specific changes are applied on a per-system basis and the user-specific changes are applied on a per-user basis;

- wherein the differences between the initial state and the modified state comprise differences between user files, system files, user registries, and system registries; and

- wherein the differences between user files and differences between user registries may be used to manage configurability of the application on a per-user basis.

Claim 7 includes the limitations, "storing differences between the initial state and the modified state as a set of configuration parameters in a depository, wherein the differences are separated into system-specific changes and user-specific changes...." To support this rejection, Examiner cites col. 8, lines 30-32, and col. 11, lines 50-60. The col. 8 citation is reproduced below:

The resulting system file changes are then discovered, 320, by taking a snapshot of the new files, which is stored as a Diff file, block 330.

Though this passage mentions storing system file changes by taking a snapshot, it does not appear to teach or suggest the claimed limitation of, "...wherein the differences are separated into system-specific changes and user-specific changes..." as claimed in claim 7. Likewise, col. 11, lines 50-60 state:

Specifically, TGAPINST operates on the branch server, containing the home directory, by attaching each USER's USER.USR file to the server's registry and then applying the registry entries from the PCURVER file to the attached USER.USR file. TGAPINST also creates the USER's default home directory, including files, ini, etc. and sets of permission allowing the USER and only the USER access. PCURVERS file is created by removing all references to HKRY\_CURRENT\_USER and all references to the home directory from the previously generated workstation diff files.

This passage appears to discuss saving information related to a user, it does not teach or suggest that, as part of storing differences between initial and modified states, system-specific and user-specific changes are separated.

It is respectfully submitted that Piazza teaches away from the claimed limitation. For example, at col. 12, lines 10-16, Piazza discusses contrasting "Curver" files for differences:

At test 960, the system determines whether a Diff (between old, current, and new Curvers files) is needed. If yes, logic branches to block 970, and the two Curvers files are dynamically contrasted (Diff) and the output Curver file captured. If no Diff required ("No" to test 960), then the new Curver file is captured. At block 1000, the captured Curver file is applied and logic terminates at block 1010.

Hence, though Piazza does appear to teach capturing the system in different states and comparing before and after snapshots by the use of Curver files, it does not teach separation of system-specific and user-specific changes, as claimed.

Hence, it is respectfully submitted that claim 7 is distinguished from the cited references.

Independent claim 20 includes limitations that also distinguish it from the cited reference for the same reasons as are applied to claim 7. It is therefore respectfully submitted that claim 20 is distinguished from the cited reference.

Dependent claim 5 is reproduced for reference:

5. (Original) The method of 4 wherein the snapshot may be configured to include or to exclude portions of data within the data processing system.

It is respectfully submitted that the Piazza reference does not teach the limitations of claim 5, namely, "wherein the snapshot may be configured to include or to exclude portions of data within the data processing system."

Examiner cites Piazza at col. 3, lines 21-33, and col. 4, lines 23-27 and 42-51. Each of these passages is reproduced below, beginning with col. 3, lines 21-33:

The system has, as a first property, a module to perform the initial Server's workstation build. This involves the local use of a special boot disk and the interconnection to a specific install support computer that has stored thereon for select use an application known as the Profiler. The boot disk is customized for the particular hardware environment that needs to be configured into a select workstation platform. The boot disk also performs the necessary programming steps to permit installation of the operating system with a pre-defined set of operating system control parameters. The use of multiple custom boot disks permits the use of several different hardware platforms including servers and laptops.

This passage does not appear to teach or suggest the claimed limitation of, "wherein the snapshot may be configured to include or to exclude portions of data within the data processing system," as claimed in claim 5.

Col. 4, lines 23-27 state:

The second process of interest is directed to system modifications. The exemplary modifications include the updating of applications on the system, the change to new hardware or role, the movement of users between workstations, and the recovery of system failure.

This passage does not appear to teach or suggest the limitations of claim 5, recited above. Finally, col. 4, lines 42-51 state:

With the foregoing overview in mind, attention is first directed to the series of figures delineating system structure as it relates to these various modes of operation. The first mode of operation involves creating the initial state for the system. This will reflect the current selection of operating system, proprietary applications, and third party (shrink wrap) applications. It will also include select user profile information that will govern that user's interaction on the resulting network--including access codes for select levels of security.

This passage does not appear to teach or suggest the limitations of claim 5, recited above.

Since claims 2-5 and 8-13 depend from claim 7, and since claims 15-18 and 21-26 depend from claim 20, the same distinctions between Piazza and the independent claims (7 and 20) are believed to apply to their respective dependent claims. Consequently, it is respectfully urged that the rejections of all claims have been overcome.

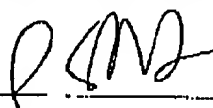
## II. Conclusion

It is respectfully urged that the subject application is patentable over Piazza and is now in condition for allowance.

The Examiner is invited to call the undersigned at the below-listed telephone number if in the opinion of the Examiner such a telephone conference would expedite or aid the prosecution and examination of this application.

DATE: 8.27.03

Respectfully submitted,



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